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TESLA, INC.

15 IN THE UNITED STATES DISTRICT COURT

16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 SAN JOSE DIVISION

18 TESLA, INC., a Texas Corporation,,

19 Plaintiff,

20 v.

21 PROCEPTION, INC., a Delaware Corporation,
and ZHONGJIE “JAY” LI, an individual,

22 Defendants.

CASE NO. 5:25-cv-04963-SVK

**[PROPOSED] ORDER SEALING
DEFENDANTS’ OBJECTION
TO NEW EVIDENCE AND
PROPOSED SUR-REPLY**

1 The Court, having considered Plaintiff Tesla, Inc.'s statement regarding the sealing of
 2 Defendants' Objection to New Evidence and Exhibit A to Defendants' Administrative Motion for
 3 Leave to File Sur Reply In Support Of Opposition to Plaintiff's Motion for Preliminary Injunction,
 4 finds that good cause exists to seal the material and hereby **ORDERS THE MATERIAL SEALED**
 5 as follows:

Document	Portions to be Filed Under Seal	Designating Party	Basis for Sealing
Dkt. 91-3, Exhibit A to Defendants' Administrative Motion for Leave to File Sur Reply ISO Opposition to Plaintiff's Motion for Preliminary Injunction	i:5 (name of Tesla employee) 1:8 (name of Tesla employee) 1:9 (sensitive Tesla vendor information) 1:21 (Tesla employee name) 1:23 (sensitive Tesla vendor information) 1:24 (Tesla employee name) 1:25 (Tesla employee name) 1:26 (Tesla employee name) 1:28 (Tesla employee name) 1:28 (sensitive Tesla vendor information) 2:1 (Tesla employee name) 2:1 (sensitive Tesla vendor information) 2:2 (sensitive Tesla vendor information) 2:3-4 (sensitive Tesla vendor information) 2:8 (Tesla employee name) 2:9 (sensitive Tesla vendor information) 2:22-23 (title of sensitive document related to Optimus) 2:25 (Tesla employee name) 2 n.1 (sensitive Tesla vendor information) 3:1-2 (title of sensitive document related to Optimus) 3:3 (Tesla employee name)	Tesla	These portions disclose personally identifiably information of non- party Tesla employees or interns that encroach upon their privacy interests. Additionally, these portions contain descriptive file names and vendor details related to trade secrets and/or the design and development of Tesla's Optimus technology, and could cause security vulnerabilities, endanger trade secrets, and inflict competitive harm on Tesla. <i>See Ahearn Sealing Decl ¶¶ 3-5.</i>
Dkt. 91-2, Defendants Objection to New Evidence and Argument in Plaintiff's Reply ISO Motion for Preliminary Injunction	3:23 (sensitive Tesla vendor information)	Tesla	These portions disclose sensitive Tesla vendor details that could cause security vulnerabilities, endanger trade secrets, and inflict competitive harm on Tesla. <i>See Ahearn Sealing Decl ¶¶ 3-5.</i>

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2 **IT IS SO ORDERED.**
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4 DATED: _____

By: _____

5 The Honorable Susan van Keulen
6 United States Magistrate Judge
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